

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Residential Capital, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 12-12020-mg

Jointly Administered

PNC Bank, National Association, et al.,

Movants, v.

MBIA Insurance Corporation,

Respondent.

Case No. 16-mc-00063-P1

Related Case No. 13-cv-3451 (SRN/JJK/HB)
in United States District Court for the District
of Minnesota

DECLARATION OF RICHARD E. GOTTLIEB

Richard E. Gottlieb, under penalty of perjury, declares as follows:

1. I am a partner at BuckleySandler LLP. I am a Member of the Bar of this Court. I have personal knowledge of the matters set forth herein and, if sworn as a witness, I could and would testify competently to the matters set forth below.

2. I submit this declaration in support of the Reply in Support Movants' Motion to Compel Compliance with Third Party Subpoena Issued to MBIA Insurance Corp. which is being filed contemporaneously in this Court. This declaration is being filed on behalf of all movants to said Motion.

3. Attached as Exhibit A is a true and correct copy of the transcript of the Preliminary Conference held before this Court on March 23, 2016.

4. Attached as Exhibit B is a true and correct copy of a Transperfect Legal Solutions' pricing proposal for document review.

5. Attached as Exhibit C is a true and correct copy of correspondence from March 19, 2015 to July 31, 2015 exchanged between counsel for MBIA and Defendants in the Lawsuits.

6. Attached as Exhibit D is a true and correct copy of correspondence from August 18, 2015 to November 4, 2015 exchanged between outside counsel for MBIA and Defendants in the Lawsuits.

7. Attached as Exhibit E is a true and correct copy of correspondence from February 25, 2016 to March 15, 2016 exchanged between outside counsel for MBIA and Defendants in the Lawsuits.

8. Attached as Exhibit F is a true and correct copy of correspondence from March 18, 2016 to March 23, 2016 exchanged between outside counsel for MBIA and Defendants in the Lawsuits.

9. Attached as Exhibit G is a true and correct copy of the Form 10-K filed by MBIA Inc. with the United States Securities and Exchange Commission, dated December 31, 2014.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of April, 2016



Richard E. Gottlieb